

# Exhibit A





**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

January 11, 2022

**BY EMAIL**

Peggy Cross-Goldenberg, Esq.  
Allegra Glashausser, Esq.  
Marne Lenox, Esq.

**Re: *United States v. Lawrence Ray*, S1 20 Cr. 110 (LJL)**

Dear Ms. Lenox:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure the Government hereby provides notice that it currently plans to call the following individual as a rebuttal expert witness at trial: Julie K. Schulman, M.D.

Dr. Schulman is a psychiatrist within the Department of Psychiatry at Columbia University Irving Medical Center. Her credentials, experience, and selected publications are available here: <https://www.columbiapsychiatry.org/profile/julie-k-schulman-md#credentials-amp-experience>. The Government will transmit a copy of Dr. Schulman's *curriculum vitae* soon. The Government expects Dr. Schulman will testify regarding her consultations with the defendant in August 2014, her conversations with him, and her impressions of him, as reflected in the notes and reports already produced in discovery, within US\_015366 to US\_015666 (the notes authored by Dr. Schulman are at US\_015441 to US\_015445, and US\_015475 to US\_015476). As reflected in her previously produced notes, Dr. Schulman concluded that "the patient's presentation has characteristics that are strongly suggestive of pseudologia fantastica, or Munchausen's disorder," and his statements and behavior raised meaningful questions about his truthfulness. Based upon her observations of and interactions with the defendant, Dr. Schulman concluded that the defendant was "not confabulating due to memory loss, nor is he psychotic or delusional." Dr. Schulman also informed the defendant that "one possibility for an elevated mercury serum level is factitious



disorder with intentional ingestion of toxic substances.”

Very truly yours,

DAMIAN WILLIAMS  
United States Attorney

by: /s/ \_\_\_\_\_  
Mollie Bracewell  
Lindsey Keenan  
Danielle Sassoon  
Assistant United States Attorneys  
(212) 637- 2218 / 1565 / 1115



# **Exhibit B**

filed under seal



# Exhibit C



## Allegra Glashausser

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**From:** Sassoon, Danielle (USANYS) <Danielle.Sassoon@usdoj.gov>  
**Sent:** Tuesday, January 18, 2022 5:40 PM  
**To:** Marne Lenox; Bracewell, Mollie (USANYS); Keenan, Lindsey (USANYS)  
**Cc:** Peggy Cross-Goldenberg; Allegra Glashausser; Neil Kelly  
**Subject:** RE: rebuttal expert notice

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi Marne,  
I spoke with Dr. Schulman and have the following additional information to share:

- Dr. Schulman's expertise is based on her specialty. In addition to her expertise in general psychiatry, she is board-certified and fellowship-trained in consultation liaison psychiatry (formerly known as psychosomatic medicine). This is essentially the study of the brain/body connection, and involves expertise in the overlap between medical and psychiatric illness. The disorders you asked about all fall under the umbrella of her expertise in assessing this overlap between medical and psychiatric illness, and her expertise in diagnosing symptoms that are not readily medically explainable. This includes assessing whether symptoms are intentional or the result of malingering, or the result of another disorder, such as one where the individual likes being a patient/in the hospital and knows he/she is creating his/her symptoms, or the result of an unconscious explanation.
- The extent of the visits and the information reviewed is reflected in the underlying medical records, which indicate that in addition to meeting with the defendant and speaking with family members, Dr. Schulman accessed easily-found public information (i.e., information from a google search of the defendant).
- While Dr. Schulman has no precise memory of the length of the visits in this case, her typical initial interview will last at least an hour, and follow up visits tend to be about half an hour or so, particularly in a case like this where the chart and lab tests will not provide all the necessary information.
- Dr. Schulman has not testified in court since at least 2007. She also has no recollection of ever testifying as an expert in court, other than a long time ago as a Resident, where on approximately two occasions she offered testimony about why a patient belonged in an in-patient psychiatric unit. Many years ago, she recalls writing reports that were used in assessing workers comp, but she did not testify. She believes she may have testified once as a fact witness about a patient. The short of it is that the Government will not be relying on prior testimony as a basis for establishing her qualifications and expertise.

Best,  
Danielle

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**From:** Marne Lenox <Marne\_Lenox@fd.org>  
**Sent:** Tuesday, January 18, 2022 3:41 PM  
**To:** Sassoon, Danielle (USANYS) <DSassoon@usa.doj.gov>; Bracewell, Mollie (USANYS) <MBracewell@usa.doj.gov>; Keenan, Lindsey (USANYS) <LKeenan@usa.doj.gov>  
**Cc:** Peggy Cross-Goldenberg <Peggy\_Cross-Goldenberg@fd.org>; Allegra Glashausser <Allegra\_Glashausser@fd.org>; Neil Kelly <Neil\_Kelly@fd.org>  
**Subject:** [EXTERNAL] RE: rebuttal expert notice

Hi Danielle,

Any update on this?



Thanks,  
Marne

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**From:** Sassoon, Danielle (USANYS) [<mailto:Danielle.Sassoon@usdoj.gov>]  
**Sent:** Wednesday, January 12, 2022 4:32 PM  
**To:** Marne Lenox <[Marne\\_Lenox@fd.org](mailto:Marne_Lenox@fd.org)>; Bracewell, Mollie (USANYS) <[Mary.Bracewell@usdoj.gov](mailto:Mary.Bracewell@usdoj.gov)>; Keenan, Lindsey (USANYS) <[Lindsey.Keenan@usdoj.gov](mailto:Lindsey.Keenan@usdoj.gov)>  
**Cc:** Peggy Cross-Goldenberg <[Peggy\\_Cross-Goldenberg@fd.org](mailto:Peggy_Cross-Goldenberg@fd.org)>; Allegra Glashausser <[Allegra\\_Glashausser@fd.org](mailto:Allegra_Glashausser@fd.org)>; Neil Kelly <[Neil\\_Kelly@fd.org](mailto:Neil_Kelly@fd.org)>  
**Subject:** RE: rebuttal expert notice

Hi Marne,

We received your questions and will get back to you. It may not be until next week because Dr. Schulman is unavailable this week due to a personal matter.

Danielle

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**From:** Marne Lenox <[Marne\\_Lenox@fd.org](mailto:Marne_Lenox@fd.org)>  
**Sent:** Wednesday, January 12, 2022 3:48 PM  
**To:** Sassoon, Danielle (USANYS) <[DSassoon@usa.doj.gov](mailto:DSassoon@usa.doj.gov)>; Bracewell, Mollie (USANYS) <[MBracewell@usa.doj.gov](mailto:MBracewell@usa.doj.gov)>; Keenan, Lindsey (USANYS) <[LKeenan@usa.doj.gov](mailto:LKeenan@usa.doj.gov)>  
**Cc:** Peggy Cross-Goldenberg <[Peggy\\_Cross-Goldenberg@fd.org](mailto:Peggy_Cross-Goldenberg@fd.org)>; Allegra Glashausser <[Allegra\\_Glashausser@fd.org](mailto:Allegra_Glashausser@fd.org)>; Neil Kelly <[Neil\\_Kelly@fd.org](mailto:Neil_Kelly@fd.org)>  
**Subject:** [EXTERNAL] RE: rebuttal expert notice

Danielle,

We have a few follow up questions on your rebuttal expert disclosure:

Please provide more detail about what formed the basis of her noticed opinion. In the course of her evaluation of Mr. Ray, how many times did Dr. Schulman meet with Mr. Ray and for how long did she meet with him each time? Did she conduct any collateral interviews in forming her opinions, and if so, with whom? Has Dr. Schulman reviewed anything other than Mr. Ray's August 2014 New York-Presbyterian medical records in connection with this case or her evaluation of Mr. Ray? If so, what else has she reviewed that serves as the basis for her noticed opinion?

Please provide a list of cases where Dr. Schulman has previously offered expert testimony.

Please elaborate on Dr. Schulman's expertise in diagnosing Munchausen's disorder/pseudologia fantastica/factitious disorder/delusional disorder.

Thank you,  
Marne

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**From:** Sassoon, Danielle (USANYS) [<mailto:Danielle.Sassoon@usdoj.gov>]  
**Sent:** Tuesday, January 11, 2022 3:48 PM  
**To:** Allegra Glashausser <[Allegra\\_Glashausser@fd.org](mailto:Allegra_Glashausser@fd.org)>; Marne Lenox <[Marne\\_Lenox@fd.org](mailto:Marne_Lenox@fd.org)>; Peggy Cross-Goldenberg <[Peggy\\_Cross-Goldenberg@fd.org](mailto:Peggy_Cross-Goldenberg@fd.org)>



**Cc:** Bracewell, Mollie (USANYS) <[Mary.Bracewell@usdoj.gov](mailto:Mary.Bracewell@usdoj.gov)>; Keenan, Lindsey (USANYS) <[Lindsey.Keenan@usdoj.gov](mailto:Lindsey.Keenan@usdoj.gov)>

**Subject:** RE: rebuttal expert notice

Attached is Dr. Schulman's resume.

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**From:** Sassoon, Danielle (USANYS)

**Sent:** Tuesday, January 11, 2022 3:14 PM

**To:** Allegra Glashausser <[Allegra\\_Glashausser@fd.org](mailto:Allegra_Glashausser@fd.org)>; Marne Lenox <[Marne\\_Lenox@fd.org](mailto:Marne_Lenox@fd.org)>; Peggy Cross-Goldenberg <[Peggy\\_Cross-Goldenberg@fd.org](mailto:Peggy_Cross-Goldenberg@fd.org)>

**Cc:** Mollie E. .Bracewell ([mary.bracewell@usdoj.gov](mailto:mary.bracewell@usdoj.gov)) <[mary.bracewell@usdoj.gov](mailto:mary.bracewell@usdoj.gov)>; Lindsey T. .Keenan ([Lindsey.Keenan@usdoj.gov](mailto:Lindsey.Keenan@usdoj.gov)) <[Lindsey.Keenan@usdoj.gov](mailto:Lindsey.Keenan@usdoj.gov)>

**Subject:** rebuttal expert notice

Marne:

Attached please find our notice of a rebuttal expert.

Best,

Danielle R. Sassoon  
Assistant United States Attorney  
Southern District of New York  
One Saint Andrew's Plaza  
New York, NY 10007  
Tel: (212) 637-1115



# Exhibit D



JULIE K. SCHULMAN, M.D.

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## EDUCATION & TRAINEESHIP

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### **Columbia-Presbyterian Medical Center, New York, NY**

Consultation-Liaison Psychiatry/Psychosomatic Medicine fellowship, July 2000–June 2001.  
Chief fellow of consultation-liaison service, March 2001–June 2001.

### **New York University Medical Center/Bellevue Hospital, New York, NY**

Internship and psychiatry residency, July 1996–June 2000.  
Harold Kaplan Award for Excellence in Psychiatric Teaching.

### **Cornell University Medical College, New York, NY**

M.D., 1996. David P. Barr Summer Fellow.  
Richard N. Kohl Prize for Excellence in Psychiatry.

### **Harvard University, Cambridge, MA**

B.A. cum laude in psychology, 1991.  
John Harvard Scholarship. Dean's List all years.

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## WORK EXPERIENCE

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### **Columbia-Presbyterian Medical Center / NYP-Allen Hospital**

**July 2007 – Present**

Assistant Clinical Professor of Psychiatry. Assistant Director for NYP-Allen Hospital, Consultation-Liaison Psychiatry Service. Consultation on patients admitted to medical, surgical, and ob-gyn services. Coordination of care with primary team and other consulting services, including neurology and palliative care. Teaching and clinical supervision of Family Medicine residents and medical students.

### **University of Colorado Health Sciences Center, Aurora, CO**

**February 2006 – June 2007**

Senior instructor. Intake evaluations and consultation-liaison psychiatry in both clinic and infirmary correctional facility settings. Coordination of care with psychologists and allied mental health professionals. Supervision of physician assistants.

### **Private Practice, Aurora, CO**

**August 2002 – February 2007**

Solo practitioner. Consultation-liaison, geriatric, and general psychiatry in private office and geriatric psychiatry inpatient settings. Medical staff, The Medical Center of Aurora. Ethics committee member, 2002-4.

### **Allen Pavilion Hospital, New York, NY**

**July 2001 – July 2002**

Clinical instructor, Columbia. Consultation-liaison psychiatry attending. Consults, supervision of housestaff, teaching of residents in Psychiatry and Family Practice.

### **Private Practice, New York, NY**

**July 2000 – July 2002**

Solo practitioner. Adult and geriatric patients, psychotherapy and psychopharmacology.

### **Bellevue Hospital, New York, NY**

**July 1999 – June 2001**

Psychiatry attending. Shift coverage as CPEP Attending or as House Doctor for psychiatry wards including detox, geriatrics, dual diagnosis, forensic, and med-psych units.



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## PROFESSIONAL ORGANIZATIONS & SOCIETIES

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### American Medical Association

APA delegate, AMA Young Physician Section, 2001-2.

### American Psychiatric Association

Member, Committee on Gay and Lesbian Issues, May 2001-5.

Consultant, Committee on Information Technology, 2000-1.

Board liaison and consultant, Joint Commission on Government Relations, 1998-2000.

Trustee, APA Board of Trustees, 1999-2000.

Trustee-elect, APA Board of Trustees, 1998-9.

Graduate, APA Executive Leadership Program, 1998-9.

### Association of Gay and Lesbian Psychiatrists

Treasurer, 2016-2017

Chair, Membership Committee, 2001-3.

### New York County Psychiatric Society [New York County District Branch, APA]

Chair, Budget and Finance Committee, May 2016-present

Past President, 2015-2016

Immediate Past President, 2014-15

President, 2013-2014

President-Elect, 2012-2013

Councilor, NYCDB Executive Council, 2011-2012

Chair, Computer Task Force, 2001-2.

**Current professional memberships:** Academy of Psychosomatic Medicine, American Psychiatric Association, Association of Gay and Lesbian Psychiatrists, New York County Psychiatric Society, New York State Psychiatric Association, Society for Liaison Psychiatry

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## SCIENTIFIC PUBLICATIONS

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Schulman, J., and Erickson-Schroth, L. (2019) Mental health in sexual minority and transgender women. Medical Clinics of North America, 103(4): 723-733.

Schulman, J., and Erickson-Schroth, L. (2017) Mental health in sexual minority and transgender women. Psychiatric Clinics of North America, 40(2): 309-319.

Schulman, J., contributor. (2014). Muskin, P. (Ed.), DSM-5® Self-exam Questions: Test Questions of the Diagnostic Criteria, American Psychiatric Press.

Schulman, J. and Shapiro, P. (2008) Depression and cardiovascular disease: What is the correlation? Psychiatric Times, 25(9): 41-44.

Schulman, J. & Stromberg, S. (2007). On the value of doing nothing: Anger and cardiovascular disease. Cardiology in Review, 15: 123-132.

Schulman, J. (2007). Stroke. In Loue, S. & Sajatovic, M. (Ed.), The Encyclopedia of Aging and Public Health, Kluwer Academic/Plenum Publishing Company.

Schulman, J., Muskin, P., & Shapiro, P. (2005). In review: Psychiatry and cardiovascular disease. Focus, May 2005, 3(2).

Schulman, J. (2004). Stroke. In Loue, S. & Sajatovic, M. (Ed.), The Encyclopedia of Women's Health, Kluwer Academic/Plenum Publishing Company.

Shapiro, P.A., Schulman, J.K., and Bagiella, E. (2002). Prediction of post-transplant survival by psychiatric evaluation of heart transplant candidates: A prospective study. Poster, Academy of Psychosomatic Medicine annual meeting, Tucson, AZ. Abstract published in Psychosomatics, Mar-Apr 2003, 44(2):164-5.

Stevens, L. & Schulman, J. (2002). Neurologic illnesses. In Schein, L., Bernard, S., Spitz, H., and Muskin, P. (Ed.), Psychosocial Treatment for Medical Conditions. New York: Brunner-Routledge.



- Schulman, J. (2000). The psychiatric consult. In Bernstein, C. & Ishak, W. (Ed.), On Call Psychiatry. Philadelphia: W. B. Saunders.
- Schulman, J. (2000). The telephone consult. In Bernstein, C. & Ishak, W. (Ed.), On Call Psychiatry. Philadelphia: W. B. Saunders.
- Wirz-Justice, A., Kräuchi, K., van der Welde, P., Schulman, J., & Wirz, H. (1992). Epidemiology of seasonal affective disorder in Switzerland. Poster, Society of Light Treatment and Biological Rhythms annual conference, Washington, DC.

**Peer reviewer:** American Journal of Psychiatry, Mayo Clinic Proceedings, Psychosomatics.

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## SCIENTIFIC PRESENTATIONS

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- Schulman, J. (2015). Hormone treatment in trans patients: What you need to know. Academy of Psychosomatic Medicine Annual Meeting, New Orleans, LA.
- Schulman, J. (2010). Neurological basis of somatoform disorders. Psychiatry Grand Rounds, Harlem Hospital, New York, NY.
- Schulman, J. (2006). An update on somatoform disorders. Psychiatry Grand Rounds, University of Colorado Health Sciences Center, Denver, CO.
- Schulman, J. (2003). Sexuality in older adults. Lecture. Senior Care Center, Aurora, CO.
- Schulman, J., chairperson. (2003). Club drugs: A primer for mental health professionals. Medical Update 4, APA Annual Meeting, San Francisco, CA.
- Schulman, J. & Stangler, R., co-chairs, and presenter. (2002). The terrorist crisis of 2001: Use and impact of electronic communication. Component Workshop 57, APA Annual Meeting, Philadelphia, PA.
- Schulman, J. (2002). The ABC's of club drugs. Medicine Grand Rounds, The Medical Center of Aurora North Campus, Aurora, CO.
- Schulman, J. (2001). The ABC's of club drugs. Medicine Grand Rounds, St. Vincent's Medical Center, CT.
- Schulman, J. (2001). The tipping point: Social psychology and mixed-gender groups. Component Workshop 76, APA Annual Meeting, New Orleans, Louisiana.
- Schulman, J., chairperson. (2001). Depression in the medically ill. Scientific and Clinical Report Session, APA Annual Meeting, New Orleans, LA.
- Schulman, J. (1999). Eating disorders in lesbians and gay men. Component Workshop 27, APA Annual Meeting, Washington, DC.
- Schulman, J. (1998). The evolution of organized gay psychiatry in the APA. Component Workshop 55, APA Annual Meeting, Toronto, Canada.
- Schulman, J. (1997). Self-disclosure in the residency application process. Component Workshop 48, APA Annual Meeting, San Diego, CA.